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October 28, 2019

**BY ECF**

Honorable Denis R. Hurley  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: *Wisdom v. Nassau County*, 16 CV 1728 (DRH) (AYS)

Your Honor:

I represent plaintiff Khalid Wisdom in the above-referenced action. I write with defendants' consent to respectfully request a one-week extension of the existing briefing schedule for the parties' cross motions for summary judgment.

By order dated August 30, 2019, the Court set a briefing schedule by which plaintiff's opposition and affirmative motion are due on October 31, 2019. If it should please the Court, the undersigned is in the midst of preparing for trial in *Hamilton v. City of New York*, 15 CV 4574 (CBA), a complex 21-year wrongful conviction action commencing November 12, 2019 in this district. The proposed extension should allow the undersigned sufficient time to prepare plaintiff's briefing in this action.

Plaintiff respectfully proposes the following revised schedule:

**Plaintiff's opposition and cross-motion served by: November 7, 2019**

**Defendants' reply and opposition served by: December 2, 2019**

**Plaintiff's reply served, and all papers filed by: December 27, 2019**

Hon. Denis R. Hurley

Oct. 28, 2019

No prior requests for adjournment of the briefing schedule have been submitted. In light of the foregoing, plaintiff respectfully requests, on consent, that the Court review and endorse plaintiff's proposed revised schedule as set forth above.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'G. Harvis', written over a horizontal line.

Gabriel P. Harvis

cc: Defense Counsel